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2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE NORTHERN DISTRICT OF GEORGIA
4 ATLANTA DIVISION

5 UNITED STATES OF AMERICA,

6 Plaintiff,

7 vs.

8 CHARONDA EDWARDS,

9 Defendant.
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) Criminal Indictment No. 1:15-CR-351-WSD-
) JSA

) **DEFENDANT'S MOTION TO TRAVEL**
) **OUTSIDE OF THE JURISDICTION**
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12 **MOTION FOR PERMISSION TO TRAVEL**
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14 COMES NOW Defendant, CHARONDA EDWARDS, by and through undersigned
15 counsel, and requests that this Court grant her permission to travel to Casselberry, Florida from July
16 22-23, 2017.

17 In support of her motion, Ms. Edwards shows the following:
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19 (1)

20 Ms. Edwards was sentenced in this case on July 11, 2017. This honorable Court allowed her
21 to voluntary surrender upon notice from the Bureau of Prisons.

22 (2)

23 Ms. Edwards' family resides in Florida. On July 22, 2017, a large surprise party is being held
24 to honor her father, Ronnie Edwards' 60th birthday. A copy of the invitation with the exact date, time
25 and location is attached hereto as Exhibit A. Ms. Edwards respectfully requests that this Court allow
26 her to travel to attend the celebration.
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1 (3)

2 Ms. Edwards has been on bond in this matter since September 24, 2015. After her guilty plea
3 on February 3, 2016, Ms. Edwards was required to put up additional bond which included location
4 monitoring and a curfew. Since her arrest, Ms. Edwards has been fully compliant with the conditions
5 of her bond. Ms. Edwards spoke with her Probation Officer about her request for travel and he
6 indicated that she would have to get permission from the Court.
7

8 (4)

9 Ms. Edwards respectfully requests that the Court grant her motion and allow her to travel
10 from July 22-23, 2017 to Casselberry, Florida to attend her father's birthday celebration.
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12 DATED: July 17, 2017

13 Respectfully Submitted,

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15 s/Drew Findling
16 Drew Findling
Georgia Bar No. 260425

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18 s/Marissa Goldberg
19 Marissa Goldberg
20 Georgia Bar No. 672798
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11 CERTIFICATE OF SERVICE

12 This is to certify that I have this day served counsel for the opposing party in the foregoing
13 matter with a copy of the within and foregoing Motions:

14 DEFENDANT'S MOTION TO TRAVEL OUTSIDE OF THE JURISDICTION

15 By electronic service:

16 Assistant United States Attorney Erin Sanders

17 This 17th day of June, 2017.

18 Respectfully submitted,

19 s/Marissa Goldberg
20 MARISSA GOLDBERG
21 Georgia Bar No. 672798